"Introduce a Standard Change Process"

To introduce a new change process - a 'Standard Change' process - into the BSC arrangements that would allow for certain, low risk, predictable and repeatable pre-authorised changes to be implemented without following the existing Change Proposal or Modification procedures. This should reduce the burden on industry and Elexon; allowing them to focus on higher value activities.

Elexon recommends that this Modification should:

- be raised by the Panel in accordance with the provisions of Section F2.1.1(d)(i);
- be assessed by a Workgroup and submitted into the Assessment Procedure

This Modification will be presented by Elexon to the BSC Panel on 9 November 2023. The Panel will consider Elexon's recommendation and determine how best to progress the Modification.

Elexon does not consider it likely that this Proposal will impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

ELEXON

Phase

- Initial Written Assessment
- Definition Procedure
- Assessment Procedure
- Report Phase
- Implementation

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About This Document

You can find the definitions of the terms and acronyms used in this document in the BSC Glossary[1].

This document is an Initial Written Assessment (IWA), which Elexon will present to the Panel on 9 November 2023. The Panel will consider the recommendations and agree how to progress this Modification.

This document is a recommendation to the BSC Panel to raise a Modification Proposal (Attachment A) in accordance with BSC Section F2.1.1(d)(i). Elexon will present this paper to the BSC Panel at its meeting on 9 November 2023. If the BSC Panel agrees to raise the Modification Proposal, this document will form its Initial Written Assessment (IWA), and the Proposal Form will be updated and published on the Elexon website accordingly.

There are four parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains the Proposal Form.
- Attachment B contains the draft redlined changes to the BSC for this Modification Proposal.
- Attachment C contains the draft redlined changes to the Code Subsidiary Documents (CSDs) for this Modification Proposal.

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Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 4, 5 and 6
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments.

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[1] https://www.elexon.co.uk/glossary/?show=all

1 Summary

Why Change

Currently, all changes to the BSC and BSC Configurable Items are required to go through the Change Process, either as a Modification Proposal (Mod) or as a Change Proposal (CP). Although these processes are very effective, there are some instances in which the process may be considered overly bureaucratic and burdensome for impacted stakeholders. A number of routine and low risk changes, and changes to standing data have been identified where public consultation and Committee approval may be considered disproportionate and unnecessary. A more efficient process should be used for these Change types.

Solution

Introduce a simplified change process to streamline those changes which are low risk, routine and repeatable, a 'Standard Change' process. This will reduce the burden on industry and Elexon for processing these kinds of changes. Identify the types of changes which could follow the Standard Change process and which of these should be included in this Mod ('enabling changes').

Impacts and costs

We do not anticipate any impacts on market participants from introducing the Standard Change framework. Elexon will need to implement this new framework and update its internal processes and customer guidance. Any further impacts on market participants or Elexon will depend on which, if any, changes are made Standard Changes as part of this Modification Proposal.

Cost Estimates			
Organisation	Implementation (£)	On-going (£)	Impacts
Elexon	1k-2k	0k	Implement changes to the BSC documents and update internal processes. We expect to save time on progressing CPs and Mods.
NGESO	0	0	
Industry	0	0	
Total	1k-2k	0	

Implementation

This Proposal should be implemented at the earliest opportunity. The Workgroup should set the Implementation approach based on what, if any enabling changes are included.

Recommendation

Elexon invite the BSC Panel to raise this Modification Proposal in accordance with BSC Section F 'Modification Procedures' 3 2.1.1 (d) (i), as we believe it better facilitates Applicable BSC Objective (d) - 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements' by introducing a Standard Change process, it will allow certain changes to be progressed more efficiently, reducing

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the burden for industry and Elexon. We believe there is value in a Workgroup assessing this Proposal. We therefore recommend it progress to the Assessment Procedure, subject to the Panel agreeing to raise it.

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2 Why Change?

What is the issue?

All changes to the BSC and BSC Configurable Items (documents and systems detailed in the BSC Baseline Statement) currently require either a Mod or a CP to amend them. These well established, controlled change processes have worked well for many years. However, for certain types of changes, these processes may be overly bureaucratic and burdensome for impacted stakeholders, especially where certain changes have become routine and low risk. Furthermore, many changes to BSC standing data require public consultation and Committee approval, which may not always be proportionate or necessary. A more efficient process, for certain types of changes should therefore be introduced into the BSC.

Background

The concept for this Proposal has been based on the Standard Change or Routine Change model in ITIL[2] (Information Technology Infrastructure Library). ITIL is a framework designed to standardise the selection, planning, delivery, maintenance and overall lifecycle of IT services within a business. ITIL defines a Standard Change as "a pre-authorised change that is low risk, relatively common and follows a specified procedure or work instruction."

A standard change is one that is frequently implemented, has repeatable implementation steps, and has a proven history of success.

Elexon presented the idea for this Proposal at the June 2023 Panel meeting (339/02[3]) within the context of simplifying and speeding up the approval and publishing of new Fuel Types on the Balancing Mechanism Reporting Service (BMRS). This was based on the following evidence:

- Fuel Type changes are well understood, low risk and low impact, as evidenced by consultation responses and repeated successful implementations.
- These changes will become simplified (lower risk and more predictable) once our new Insights platform (the new Kinnect system) officially replaces the legacy BMRS system, as Fuel Type changes will be a configuration, rather than a functional code-based change on Insights.
- The last four Fuel Type consultations have had 1 to 2 responses, with all but one from either NGESO or the impacted Interconnector and have always fully supported the change.
- The Imbalance Settlement Group (ISG) and the Panel have not had any material comments on these changes for at least the last five years.

The Panel were supportive in principle of this idea and so Elexon subsequently worked up this proposal and some strawman redlining (see Attachment A).

Elexon presented this proposal to the Supplier Volume Allocation Group (SVG) at its meeting on 3 October 2023. The SVG were supportive of the idea and raised no

[2] https://www.itlibrary.org/
[3] https://www.elexon.co.uk/meeting/bsc-panel-339/

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objections, noting further consideration would be needed. Elexon will present this proposal to the Imbalance Settlement Group on 7 November 2023 for feedback.

Desired outcomes

- Introduce a simplified change process for certain types of changes that meet pre-defined criteria – a Standard Change Process.
- Reduce the burden on industry and Elexon for progressing these types of changes.
- Identify which types of changes could follow the Standard Change process, and which of these, if any, should be included within this Modification Proposal (i.e. any enabling changes needed for a change to follow the Standard Change process).

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3 Solution

Proposed solution

In order to address the issue identified in this proposal, a Standard Change process should be established. Standard Changes are common and follow a well-defined process. Because that process has already gone through the risk assessment and approval process, it doesn't need to go through the process again every time there's another instance of that activity.

BSC Section F[4] 'Modification Procedures' should be updated to recognise the Standard Change process, as being detailed in BSCP40 Change Management[5].

BSCP40 should be updated to define two new processes (see appendix 1 for high level process diagrams):

- A process to establish specific types of changes as a Standard Change:
    - A Standard Change log should be established to record the details of any changes that have been approved to follow the Standard Change process;
    - A minimum notice period will be consulted on as part of this establishing process, which will be the minimum notice that Elexon must give, for that specific type of change e.g. MDD, before it can make the change; and
- A Standard Change process.

The criteria that must be met for a change to be classified as a Standard Change should be validated by the Workgroup. The following criteria are proposed:

Criteria
Low risk - A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to the IT environment or the business processes it supports. This means that the change has been tested thoroughly, has been implemented multiple times in the past without significant issues, or is well understood by the teams implementing it. The consequence of failure, if it occurs, is minimal.
Repeatable - This relates to the ability to implement the change consistently over and over again without variations in the process or outcome. For a change to be considered standard, it must be repeatable. This means that the same steps are followed each time, and the results are consistent every time the change is made.
Predictable - This pertains to the expected outcomes of implementing the change. A predictable change is one where the outcome is known, based on previous implementations or thorough testing. There shouldn't be any surprises when the change is made. The results of the change should be consistent every time it's implemented.
Any other criteria published on the BSC Website as agreed by the Panel from time to time

Fuel Types

Fuel types refer to the different ways in which fuel is generated and subsequently reported on the BMRS.

The different fuel types are identified during reporting by pre-determined code practices.

Market Domain Data

Market Domain Data (MDD) is the central repository of reference data used by Suppliers, Supplier Agents and Licensed Distribution System Operators (LDSOs) in the retail electricity market. It is essential to the operation of Supplier Volume Allocation (SVA) Trading Arrangements.

MDD is produced by the Supplier Volume Allocation Agent (SVAA) in the form of Data Transfer Network (DTN) flows D0269 (Market Domain Data Complete Set) and D0270 (Market Domain Data Incremental Set).

[4] https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures#section-f
[5] https://bscdocs.elexon.co.uk/bsc-procedures/bscp-40-change-management

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The Workgroup should also consider whether an objection or appeal mechanism is required within the Standard Change framework.

Which changes could follow the Standard Change process?

It will be more efficient for industry and Elexon to consider what types of changes could follow the Standard Change process and of those, which should be included in this Modification Proposal, as part of this Modification's Assessment Procedure.

Elexon have identified the following list of potential changes that could be classified as a Standard Change, but welcome further suggestions from the Workgroup:

- Adding, amending or removing Fuel Types on BMRS
- Changes to Market Domain Data (MDD)

The Workgroup should evaluate whether these meet the criteria and whether they should be included within this solution and, if so, what enabling changes (changes needed to the BSC so that they can follow the Standard Change process and not the existing processes) are needed. We provide our current analysis of this in Appendix 2. Elexon believe including one to three enabling changes within this solution would provide the right balance of efficiency versus effort and timescales to progress as separate changes, once the Standard Change framework has been implemented.

Fuel Type

At this stage, we have developed redlining for making Fuel Types changes follow the Standard Change process (but not for MDD). The amended process (in Section Q6.1.18):

- Recognises that additions or amendments to a "Fuel Type Category" shall follow the Standard Change process;
    - This has the effect that changes to the "NETA Interface Definition and Design Document Part 1 – Interfaces with BSC Parties and their Agents" can be made by Elexon via the Standard Change process rather than via a CP; and
- Requires the list of "Fuel Type Categories" to be published on the BSC Website, instead of in BSC Section Q.

Benefits

The main benefits of this Modification Proposal relate to introducing a proportionate and streamlined change process for low risk, repeatable and predictable changes, resulting in:

- Reduced burden for industry monitoring and responding to consultations which elicit little or no response, either due to no impact or full support;
- Reduced burden for Elexon and the Panel and Panel sub-Committees, as they will no longer need to approve these changes. Elexon estimate that if Fuel Type changes are treated as Standard Changes, the effort to progress this proposal will be recovered after three Fuel Type changes.

Applicable BSC Objectives

This Modification Proposal will better facilitate Applicable BSC Objective (d) as it will allow certain changes to be progressed more efficiently, reducing the burden for industry and Elexon.

What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

(g) Compliance with the Transmission Losses Principle

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This Modification is neutral against all other BSC Objectives

Legal Text Changes

Please see Attachment A for draft legal text and Attachment B for draft redlining to BSCP40. This only includes drafting to facilitate the introduction of the new Standard Change process, plus adding Fuel Type changes as a Standard Change. If the Workgroup decide, for efficiency, to make other changes a Standard Change, then any enabling changes will also need to be drafted and included in this proposal.

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4 Areas to Consider

In this section, we highlight areas, which we believe a Workgroup should consider as part of its assessment of this Modification Proposal. We recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

The Workgroup should examine the criteria for the Standard Change process, define it and determine whether it is suitable for application.

The Workgroup should also explore whether an objection or appeal framework will be required and, if they determine that it is necessary, define the process by which appeals or objections are managed.

There would be value in considering which changes are suitable for the Standard Change process and which may be included in this Modification Proposal as part of this Modification's Assessment Procedure.

In order to better understand the materiality of this Proposal, input should be sought from BSC Parties to better understand the issue, impacts and benefits case to making this change.

Areas to consider

The table below summarises the areas we believe a Modification Workgroup should consider as part of its assessment of the Proposal.

Type	Areas to Consider
Specific	What criteria should be met in order for a change to be established as a Standard Change?
	Is there a need for an objection or appeal mechanism within the Standard Change framework? If so, how should it be implemented?
	Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?
Standard	How will this Modification impact the BSC Settlement Risks?
	What changes are needed to BSC documents, systems and processes to support this Modification, and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
	Are there any Alternative Modifications?
	Should this Proposal be progressed as a Self-Governance Modification?
	Does this Modification better facilitate the applicable BSC Objectives than the current baseline?
	Does this Proposal impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

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5 Likely Impacts and costs

Estimated costs

Costs will be assessed during the Assessment Procedure. However, for those roles we believe will be impacted, we have indicated in the impacts section whether we believe the costs are likely to be high, medium or low based on the following categories:

High: >£1 million

Medium: £100-1000k

Low: <£100k

The costs and impacts to implement and operate the Standard Change framework will be low for Elexon. We do not expect this to impact market participants. However, any changes that are needed to make a change follow the Standard Change process, for example MDD, could impact market participants and will need to be assessed.

We have included the estimated costs and impacts for introducing the Standard Change framework and making Fuel Type changes a Standard Change only, at this stage.

Implementation costs estimates			
Organisation	Item	Implementation costs (£)	Comment
Elexon	Systems	0	
	Documents	1k-2k	Costs to implement changes to the BSC and subsidiary documents
	Other	1k-5k	Costs to implement and update internal processes and external guidance / website
NGESO	Systems	0	
	Other	0	
Industry	Systems & processes	0	
	Total	1k to 7k	

On-going costs estimates		
Organisation	On-going costs (£)	Comment
Elexon	2.5k to 3.5k savings per Fuel Type change	Standard Change Process absorbed into Elexon BAU. For Fuel types, we expect to save ~5 days effort per change.
NGESO	0	No impact expected
Industry	0	No impact expected
Total	2.5k to 3.5k saving per Fuel Type change	

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Impacts

Impact on BSC Parties and Party Agents		
Party/Party Agent	Potential Impact	Potential cost
Parties and Party Agents	No impact from introducing the Standard Change framework itself. Exact impacts will depend on what, if any, enabling changes are included within this Modification.	L

Impact on the NETSO	
Potential Impact	Potential cost
No impact anticipated	N/A

Impact on BSCCo		
Area of Elexon	Potential Impact	Potential cost
Rules Management	Implement the changes to the BSC documents and processes.	L
Settlement & Insights	No impact form introducing the Standard Change framework itself. Update internal processes for Fuel Type changes to align to Standard Change process (instead of CP process).	L

Impact on BSC Settlement Risks
The impact on the Settlement Risks will be considered during the Assessment Procedure. At this stage we do not expect this Proposal to impact the Settlement Risks, as we are not amending rules that impact Settlement.

Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
Rules Management and Settlement & Insights	No impact on BSC systems. Positive impact on efficacy

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
N/A	N/A

Impact on Code	
Code Section	Potential Impact
Section F	Amendment to include BCS Standard Change procedure

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Impact on Code	
Code Section	Potential Impact
Section Q	Enabling change to allow Fuel Type changes to follow the Standard Change process.
Section X Annex-1	Update to BSC Defined Terms

Impact on MHHS
We do not expect any impact on the MHHS programme. We believe any enabling changes that impact the MHHS design should not be progressed at this stage.

Impact on EBGL Article 18 terms and conditions
We do not anticipate any impacts on the EBGL terms and conditions. We will validate this during the Assessment Procedure.

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BSCP40	Include two new processes and associated defined terms: 1. Standard Change identification and approval 2. Standard Change Process

Impact on other Configurable Items	
Configurable Item	Potential Impact
TBC	Will depend on what, if any enabling changes are needed

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	None identified
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Grid Code	
Retail Energy Code	
Supplemental Agreements	
System Operator-Transmission Owner Code	

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Impact on Core Industry Documents and other documents	
Document	Potential Impact
Transmission Licence	
Use of Interconnector Agreement	

Impact on a Significant Code Review (SCR) or other significant industry change projects
We have not identified any impact on any open SCRs and have requested Ofgem to treat this Modification as SCR-exempt. Depending on which, if any enabling changes, there may be some minor impact on the MHHS code drafting (consequential re-drafting and re-baselining, but not design impacts) that will need to be amended to reflect the intent of the proposal e.g. for MDD. The exact impacts will depend on what enabling changes are included in this proposal.

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability None identified	Neutral
2) Lower bills than would otherwise be the case None identified	Neutral
3) Reduced environmental damage None identified	Neutral
4) Improved quality of service None identified	Neutral
5) Benefits for society as a whole None identified	Neutral

What are the consumer benefit areas?

1) Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?

2) Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?

3) Will this proposal support:
i)new providers and technologies?
ii) a move to hydrogen or lower greenhouse gases?
iii) the journey toward statutory net-zero targets?
iv) decarbonisation?

4) Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.

5) Are there any other identified changes to society, such as jobs or the economy.

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6 Proposed Progression

Next steps

We recommend the Panel raise this Proposal in accordance with BSC Section F2.1.1(d)(i)[6], as we believe it will better facilitate Applicable BSC Objective (d) for the reasons stated above.

Should the Panel agree to raise this Modification Proposal, we recommend that this Modification progress to the Assessment Procedure, in order to seek input from BSC Parties. Whilst we have already worked up the Standard Change framework, there would be value in working with industry on the potential candidates for becoming Standard Changes and the enabling changes required.

If Elexon are unable to form a Workgroup within a reasonable timeframe, we would suggest proceeding directly to the Report Phase with only the Standard Change framework and the enabling changes needed for Fuel Type changes to be established as a Standard Change.

Workgroup membership

We will seek Workgroup Members with expertise in:

- Change Management
- BSC and code governance

We will invite the Issue 102[7] 'BSC Change Process Review' members to join this Workgroup.

Self-Governance

Although this Proposal seeks to amend the Code's Governance procedures, introducing the Standard Change framework itself is not material, as no changes will follow the process, until categorised as suitable for following the Standard Change process. Therefore, the types of changes, and the associated enabling changes, that are included in this proposal, will determine the impact on the Self-Governance criteria. Whilst by definition, Standard Changes will be low risk and routine and therefore should not impact the Self-Governance criteria, the exact impacts will need to be considered against the Self-Governance criteria.

Timetable

The proposer recommends the following timetable:

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	9 November 2023
Initial Workgroup Meeting	W/C 4 December 2023
Assessment Procedure Consultation	5 February 2024 – 23 February 2024

[6] On the recommendation of BSCCo in accordance with Section C3.8.8 or Section H9.8;

[7] https://www.elexon.co.uk/smg-issue/issue-102/

What is the Self-Governance Criteria?

A Modification that, if implemented:
(a) does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions; except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:
(i) correcting minor typographical errors;
(ii) correcting formatting and consistency errors, such as paragraph numbering; or
(iii) updating out of date references to other documents or paragraphs;
(b) is unlikely to have a material effect on:
(i) existing or future electricity consumers; and
(ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
(iii) the operation of the national electricity transmission system; and
(iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
(v) the Code's governance procedures or modification procedures; and

(b) is unlikely to discriminate between different classes of Parties.

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Proposed Progression Timetable	
Event	Date
Workgroup Report presented to Panel	14 March 2024
Report Phase Consultation	18 March 2024 – 29 March 2024
Present Draft Modification Report to Panel	11 April 2024
Issue Final Modification Report to Authority	17 April 2024

Implementation approach

This change should be implemented at the earliest opportunity to realise the benefits.

The Implementation Date will depend on the solution, including the extent of any enabling changes, and whether the Self-Governance criteria are met. The recommended Implementation Date should therefore be determined by the Workgroup, but could be as quick as five Working Days after approval or in the next appropriate Standard BSC Release, subject to the implementation activities required for any enabling changes.

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7 Recommendations

We invite the Panel to:

- **RAISE** this Modification Proposal in accordance with Section F2.1.1(d)(i);
- **AGREE** that this Modification progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for this Modification Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

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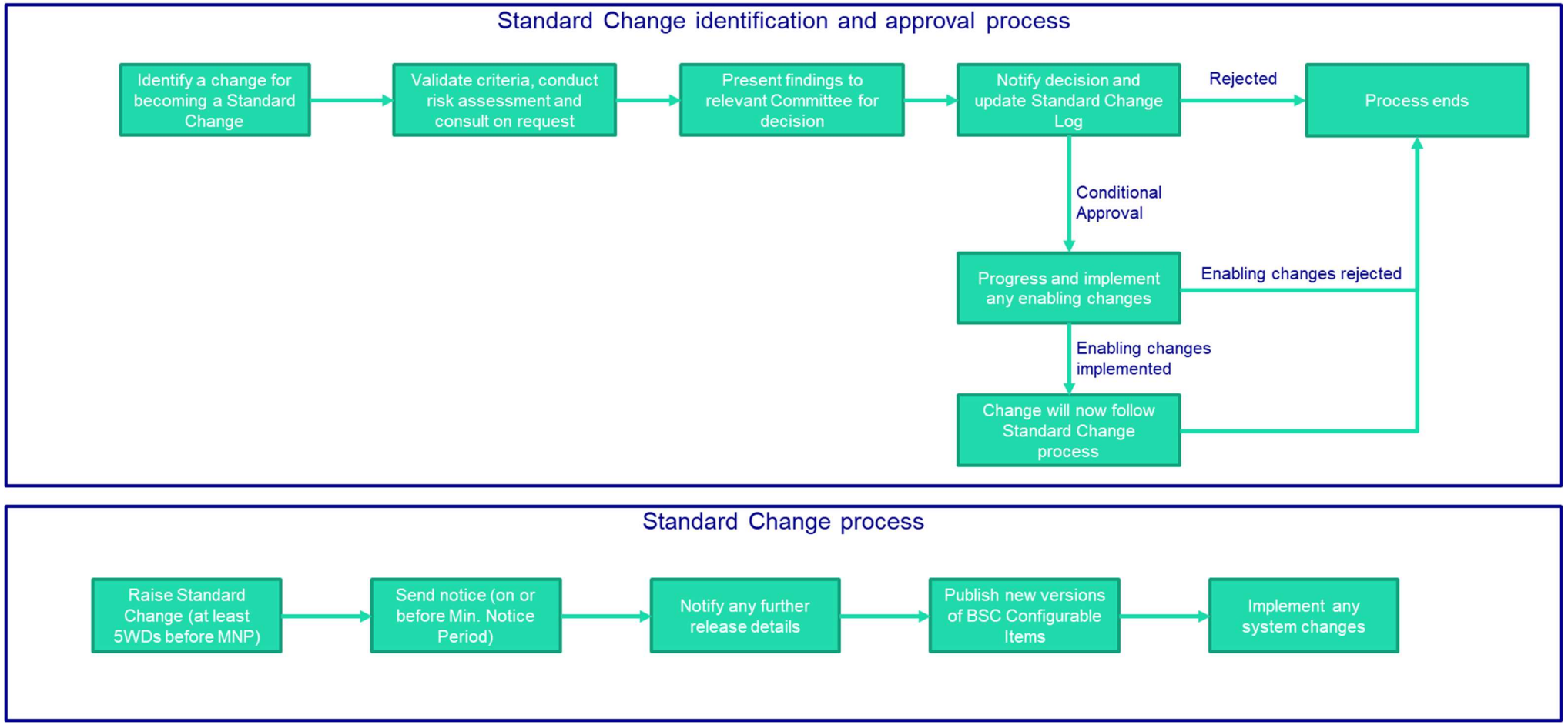
8 Appendix 1: High level process diagrams for the Standard Change Framework



9 Appendix 2: Analysis of potential Standard Changes

Candidate	Low Risk	Repeatable	Predictable	Supporting Evidence	Conclusion
Adding, amending or removing Fuel Types on BMRS	1) Changes to fuel types has no impact on Settlement. 2) New system does not require complex code changes to ingestion logic. 3) Reporting has no major changes to schema and minimal impact to customers consuming the data.	Frequent changes has resulted in well documented processes for system changes and testing. Changes to include a new fuel type on the data set with no major changes to schema. Future changes will not require code changes.	Registration process highlights naming convention ahead of time. All system impact and reporting changes are known ahead of time. Previous changes have not come across unaccounted requirements during implementation	• Mean 1 change per year • Elexon has not had any material consultation responses, resulting in changes to the solution (since at least 2017) • Consultation respondents have always supported the change (since at least 2017) • The committees/Panel have not rejected any changes (since at least 2017) • Fuel Types are pre-determined at registration and how the assets submit physical dynamic data in the Balancing Mechanism	Elexon believes that Fuel Type changes are suitable for following the streamline Standard Change process. Section Q could be updated to remove the need for Panel approval and move the list of Fuel Types to the BSC Website.

Changes to Market Domain Data (MDD)	1) Market Participants can submit requests to include or amend data for their associated MPIDs in MDD only. 2) Data submissions must meet set parameters set out in BSCP509 (Entity Forms) and cannot deviate away from the form structure. 3) Submissions are validated by Elexon and the CRA. 4) Only BSC Parties can submit requests to include or amend data. 5) Market Participants can respond to a monthly IA but this is very rarely happens and points raised are not material (Caveat - unless there is a larger project such as Targeted Charging Review - TCR).	MDD is version controlled and processed on a monthly basis. This has resulted in a well documented activity, made easier by the set requirements detailed within BSCP509 which need to be met in order to be entered into the central repository.	MDD follows a strict timetable which is published each November/December to Industry. All data submitted for MDD is based on set structures with determined inputs and outputs.	• Changes happen on a monthly basis • 37 changes in the last three years • Elexon has received 12 consultation responses in the last three years. • There have been 2 responses in the last three years which resulted in a change to the suggested solution • The committees/Panel have not rejected any changes in the last three years. • There has been no material committee feedback	Elexon believes that changes to MDD are suitable to follow the streamline Standard Change process. The Workgroup should consider is a appeal or feedback mechanism is required. MDD will continue to receive regular updates and these will continue to be reported in line with the current model - data which relates to Supplier Volume Allocation to be provided by the SVAA to all persons involved in Settlement in accordance with BSCP509